The Honorable Robert S. Lasnik 1 2 3 4 5 6 7 UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON 8 ANANAIS ALLEN, an individual, and AUSTIN ) Case No. 2:16-cv-1137-RSL 9 CLOY, an individual, Plaintiffs, JOINT MOTION TO CONTINUE 10 TRIAL DATE AND AMEND CASE v. **SCHEDULE** 11 FLIGHT SERVICES AND SYSTEMS, INC., a foreign corporation, NOTE ON MOTION CALENDAR: 12 Defendant. **September 20, 2017** 13 The Parties, by and through their respective counsel of record, move the Court for an 14 Order continuing the trial date in this matter by a period of approximately six months, and 15 continuing all unexpired court deadlines, including, but not limited to, the deadline for change in 16 17 trial date, discovery cutoff, dispositive motion deadline, and pre-trial deadlines, accordingly. The 18 Parties seek this continuance to participate in settlement discussions and alternative dispute 19 resolution. 20 I. **FACTS AND ARGUMENT** 21 This case was originally filed in King County Superior Court on March 21, 2016. On July 22 22, 2016, the matter was removed from King County Superior Court and filed in the United States 23 District Court for the Western District of Washington as a putative class action under Civil Rule 24 23. Trial is currently set for February 5, 2018, and the discovery cutoff is currently set for October 25 8, 2017. The Parties have engaged in discovery related to this case in a cooperative and 26

JOINT MOTION TO CONTINUE TRIAL DATE AND AMEND CASE SCHEDULE - 1 Case No. 2:16-cv-1137-RSL BADGLEY MULLINS TURNER PLLC 19929 Ballinger Way NE, Suite 200 Seattle, WA 98155 TEL 206.621.6566 FAX 206.621.9686

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collaborative manner; however, additional time is needed by the Parties to participate in settlement negotiations and continued discovery. To facilitate this, the Parties respectfully request that the Court continue the trial date and unexpired case schedule deadlines by approximately six months.

Good cause exists for this continuance, and thus the Parties respectfully request:

- 1. A continuance of the trial date by approximately six months.
- 2. Issuance of an Amended Case Schedule with new scheduling dates reflecting the new trial date.
- 3. A continuance of all unexpired case schedule dates, including, but not limited to, the deadline for change in trial date, discovery cutoff, dispositive motion deadline, and pre-trial deadlines, in accordance and in due course to accommodate the new trial date.

## II. CONCLUSION

For these reasons, the Parties respectfully request that the Court continue the trial date in this matter by a period of approximately six months and continue all unexpired court deadlines accordingly.

DATED this 20<sup>th</sup> day of September, 2017.

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## Case 2:16-cv-01137-RSL Document 33 Filed 09/20/17 Page 3 of 3

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